

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,)	
)	
Plaintiff,)	
v.)	C.A. No. 05-495-JJF
)	
LAWNS UNLIMITED, LTD., AND)	
EDWARD FLEMING,)	
Defendants.)	

**DEFENDANTS' SECOND SET OF INTERROGATORIES
DIRECTED TO PLAINTIFF**

Defendants, pursuant to Rule 33 of the Federal Rules of Civil Procedure, hereby propound and serve the following written interrogatories to be answered under oath 30 days after service of these interrogatories. These interrogatories are deemed to be continuing, the answers to said interrogatories are to be kept current so as to require further or supplemental answers between the time the interrogatories are served and the time of hearing or trial. If any of the interrogatories cannot be answered in full, they should be answered to the extent possible. Please answer each question separately and fully in writing, under oath, and serve a copy on the attorney whose name and address is attached on the last page hereof.

INSTRUCTIONS

1. Each and every definition set forth in Defendants' Second Set of Interrogatories to Plaintiff are incorporated by reference as if fully set forth herein.
2. For each document asserted to be privileged or otherwise excludable from discovery, the document shall be identified, and the basis for such claim of privilege or other ground for exclusion shall be stated.

3. For any document no longer in existence or which cannot be located, identify the document; state how and when it passed out of existence or why it can no longer be located and the reasons therefore, and identify each person having knowledge concerning such disposition or loss and each document evidencing its prior existence and/or any fact concerning its nonexistence or loss.

4. Unless otherwise specified, each interrogatory relates to, covers, and requests information for any and all periods prior to the date answers are filed, and each requires a continuing answer.

5. Whenever you are requested to give a date, give the exact day, month, and year, but if you cannot do so, give your best estimate thereof.

6. You are requested seasonably to supplement or amend your responses to these interrogatories based upon any and all information obtained after filing such responses.

7. "Describe in detail," or words of similar import, means to state what is requested to be described including each opinion or contention that relates to facts or the application of law to the facts known and held concerning what is requested to be described, including (i) the identity of each person you believe to have any knowledge of each fact and/or opinion relating to what is described, (ii) the identity of each document evidencing the answer given or in any way related to, reflecting, evidencing, or arising out of what is disclosed in your answer, and (iii) all relevant or material dates or time periods.

INTERROGATORIES

20. Identify all payments you remitted to any health care provider or insurer, including but not limited to, Optimum Choice and Blue Cross Blue Shield, during the period of December 23, 2003 through April 22, 2004, and for each such payment, identify the amount of the payment, the payee to whom payment was issued, and describe for what the payment was owed, including but not limited to, a co-pay for services, visits, or treatment by a health care provider, and a premium paid to an insurer.

ANSWER:

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Margaret M. DiBianca, Esq.

William W. Bowser, Esquire (Bar I.D. 4539)
Margaret M. DiBianca, Esquire (Bar I.D. 4539)
The Brandywine Building, 17th Floor
1000 West Street
P.O. Box 391
Wilmington, Delaware 19899-0391
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Email: mdibianca@ycst.com
Attorneys for Defendants

DATED: April 27, 2007

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RENEE M. BUTZ,)	
)	
Plaintiff,)	
v.)	
)	C.A. No. 04-970-JJF
LAWNS UNLIMITED, LTD., and)	
EDWARD FLEMING,)	
)	
Defendants.)	
)	

NOTICE OF SERVICE

I, Margaret M. DiBianca, Esquire, hereby certify that on **April 27, 2007**, two (2) true and correct copies of **DEFENDANTS' SECOND SET OF INTERROGATORIES DIRECTED TO PLAINTIFF** were caused to be served by depositing same in the United States Certified Mail, Return Receipt Requested and U.S. Mail, postage prepaid to the following non-registered participant:

Renee M. Butz
58 Hickory Drive
Northeast, MD 21901

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Margaret M. DiBianca, Esq.

William W. Bowser, Esquire (Bar I.D. 2239)
Margaret M. DiBianca, Esquire (Bar I.D. 4539)
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Facsimile: (302) 571-3476
E-mail: mdibianca@ycst.com
Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2007 I electronically filed NOTICE OF
DEFENDANTS' SECOND SET OF INTERROGATORIES DIRECTED TO PLAINTIFF
with the Clerk of Court using CM/ECF, and, on the same day, caused two (2) copies of such
Notice to be deposited in the U.S. Certified Mail, Return Receipt Requested and U.S. Mail,
postage prepaid to the following non-registered participant:

Renee M. Butz
58 Hickory Drive
Northeast, MD 21901

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Margaret M. DiBianca, Esq.

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DATED: April 27, 2007